

December 12, 2018

To: The Federal Communications Commission:

The Honorable Ajit Pai, Chairman

The Honorable Michael O'Rielly, Commissioner

The Honorable Brendan Carr, Commissioner

The Honorable Jessica Rosenworcel, Commissioner

455 12th Street, Southwest
Washington, DC, 20544

Subject: *MB Docket No 05-311 In the Matter of Implementation of Section 621(a)(1) of the Cable Communications Policy Act of 1984 as Amended by the Cable Television Consumer Protection and Competition Act of 1992*

The League of Women Voters is a strong advocate for freedom of speech, freedom of expression, and transparency in government.

The Federal Communications Commission is considering a decision that would dramatically reduce the funding received by cities and counties across the country by allowing cable TV operators to significantly reduce their franchise fee payments by creating their own valuations for "in-kind" services such as community access TV channels, network connections, live transmission services (for County Courthouse and City Halls, schools, libraries and other community anchors), and other support currently required in local cable franchise agreements.

The proposed findings in this proceeding are misinformed and will harm the public interest by reducing local voices and diminishing broadband media resources available in our community.

In Humboldt County, California, the benefits of community access media serve the public interest directly by providing a free and open platform for non-commercial speech.

Coverage of local government meetings helps citizens be informed participants in our local community. Local programs connect citizens to activities and events in our neighborhoods and the wider community. Diverse culture and arts are freely shared through community access media. Community centered media provide an open window to our local economy, helping entrepreneurs and workers to develop and share employment and job training opportunities. Access to education and local knowledge supports lifelong learning. Local media connections make our community more resilient - helping us prepare, respond and recover in case of disaster. The FCC's proposal of gifting commercial cable operators with reduced obligations would amount to corporate welfare for absentee owners at the direct expense of our local community.

Community media access empowers local experts to share their knowledge with students across the community. Local knowledge and unique digital archives of historic and cultural significance are captured and shared via robust non-commercial media access. Commercial

media networks restrict and further monetize access, favoring voices of distant owners, monocultures and commercial ideas. Without community access media, local knowledge becomes less available and more costly to deliver.

Local communities co-exist with our natural resources, and effective management of those natural resources increasingly relies upon informed and connected communities to support diverse economic activity and efficient, effective public uses. The loss of local non-commercial media will reduce awareness of local issues, employment opportunities and public services. Concentrating market power in corporate centers tied to distant owners harms localism, diversity and competition in the marketplace of ideas.

Community access to non-commercial media is particularly vital for creative local economies where innovation and diverse cultures thrive. Commercial networks monetize scarcity and reduce diversity by creating barriers to enter the marketplace of ideas. Without non-commercial community access media, diverse local voices have less access.

Lacking PEG access media, absentee commercial operators would be the sole gatekeepers between consumers, businesses, nonprofits and public agencies and the people they serve. Commercial media direct people to advertising or whatever content most benefits the network owner. Local PEG access media support freedom of information and expression.

We urge the FCC to forbid cable companies from reducing their payments to the non-profit community media access (PEG) stations which it has been funding through franchise fees.

Respectfully,



Rollin Richmond, President
League of Women Voters - Humboldt County